

EXHIBIT 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)	
OTTOMOTTO LLC; OTTO)	
TRUCKING LLC,)	
)	
Defendants.)	

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF LIOR RON

San Francisco, California

Monday, June 19, 2017

Volume I

Reported by:

SUZANNE F. GUDELJ

CSR No. 5111

Job No. 2641996

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1 meeting. It was not that long ago after he
2 initially brought it up to me.

3 Q And who was at that Uber meeting?

4 A Well, the ones I recall for certain are
5 Anthony, myself, Travis and Karen and Nina. 09:39:11

6 Q And can you just give that -- full names or
7 the last names just for the record.

8 A I'll try. Myself, Lior Ron; Anthony
9 Levandowski; and Travis, Uber CEO, Travis Kalanick;
10 and Nina from Uber's corp development team. Nina -- 09:39:39

11 Q Qi?

12 A -- Qui, Q-u-i [sic]. And I can try and say
13 Cam's last name, but I'll miserably fail. So
14 Cameron --

15 Q Start with a "P"? 09:39:52

16 A I'm sorry?

17 Q Last name start with a "P"?

18 A Yes. I believe so, yes.

19 Q Okay.

20 A -- from Uber's corporate development team 09:39:59
21 as well.

22 Q Got it. Okay. And so what did the folks
23 from Uber say when Levandowski told them that he was
24 in possession of some Google files?

25 MR. PATCHEN: Objection to the form. 09:40:17

1 THE WITNESS: So first, I don't remember
2 exactly what Anthony -- how he brought it up, so I'm
3 in no position to sort of comment on the specificity
4 of that, but he brought up topic.

5 And then I do recall -- it's hard to right 09:40:33
6 now recall the specific wording, but I do recall the
7 impression sort of that I was left in the --
8 participating in the meeting. So Travis said
9 something along for the lines of -- and sorry for
10 the "S" word -- "I don't want this shit anywhere 09:40:54
11 close to Uber." And -- and I do believe he repeated
12 that twice. That did leave an impression with me
13 because of the use of the "S" word and the
14 repeating, so... And so that's what I recall Travis
15 saying. 09:41:14

16 I do recall -- again, this is from a
17 distance, but I do recall, I think, that Nina didn't
18 speak much, 'cause I do remember noting that I don't
19 think she said much, if any, on that topic.

20 It's also important to understand the 09:41:33
21 context that was in a meeting that we've discussed
22 also, other topics around the negotiation. That was
23 one of the topics. So on that specific topic, I
24 don't recall Nina saying much.

25 And then I don't recall exactly what Cam 09:41:49

1 said. I do recall he said something. And it left
2 an impression with me that he was being maybe
3 thoughtful about it and trying to sort of assess
4 what to do. But I don't remember exactly what Cam
5 said as it relates to that topic. 09:42:14

6 BY MR. PERLSON:

7 Q Okay. Did -- in that meeting, did anyone
8 at Uber direct Mr. Levandowski to take any action in
9 relation to the files he had?

10 A Not something specific I can remember right now. 09:42:36

12 Q Okay. The -- did anyone express -- at that
13 meeting, did anyone at Uber express -- well, let me
14 start over again.

15 Did anyone at that meeting with Uber ask 09:42:57
16 why Mr. Levandowski still had those Google files?

17 MR. PATCHEN: Objection to the form.

18 THE WITNESS: I -- I don't remember
19 anything specific on that. I don't believe so.

20 BY MR. PERLSON: 09:43:22

21 Q Did -- at that meeting -- well, let me ask
22 you separate from that meeting.

23 When Mr. Levandowski first told you that he
24 had some Google files after you had both left
25 Google, did you ask him why he still had those 09:43:39

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

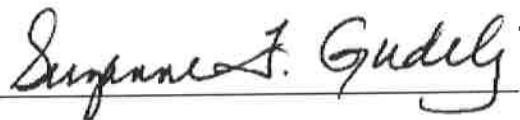
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [X] was [] was not requested.

16 I further, certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: June 20, 2019

22
23 

24 SUZANNE F. GUDELJ

25 CSR No. 5111